



State of Arizona
Department of Education

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MEMORANDUM

TO: Sponsors of the National School Lunch Program, Child and Adult Care Food Program and Summer Food Service Program

FROM: Mary Szafranski, Deputy Associate Superintendent
Arizona Department of Education, Health and Nutrition Services

Mark Frantz, Acting Director
Arizona Department of Education, School Nutrition Programs

Melissa Conner, Director
Arizona Department of Education, Child and Adult Care Food Program
Summer Food Service Program

DATE: June 3, 2013

SUBJECT: Questions and Answers Regarding the Participation of Head Start Programs in Child Nutrition Programs

Original Signed

The purpose of this memorandum is to consolidate the United States Department of Agriculture's (USDA's) policy regarding the participation of Head Start Programs in the Child Nutrition Programs. For more information about the Head Start Program and Early Head Start Program, please see the Office of Head Start's website: <http://www.acf.hhs.gov/programs/ohs/>.

This memorandum supersedes the following previously issued memoranda:

- CN# 04-09: *Automatic Eligibility for Early Head Start Participants*, August 26, 2008;
- CN# 08-08: *Automatic Eligibility for Free Meal Benefits Extended to All Children Enrolled in Head Start*, June 25, 2008;
- *Automatic Eligibility of State-Funded Pre-Kindergarten Participants for Free Meals in the Child and Adult Care Food Program (CACFP), the National School Lunch Program (NSLP), and the School Breakfast Program (SBP)*, July 22, 1999; and



- *Automatic Eligibility for Free Meals in the National School Lunch Program (NSLP), School Breakfast Program (SBP), Special Milk Program (SMP) and Child and Adult Care Food Program (CACFP) for Participants in the Head Start Program, April 14, 1995.*

Section 336 of the Healthy Hunger-Free Kids Act of 2010, tasked the Secretary with examining and reporting on the feasibility of reducing unnecessary or duplicative paperwork in the Child and Adult Care Food Program (CACFP). In response, the Food and Nutrition Service (FNS) established a Paperwork Reduction Work Group. Based on recommendations from this work group, this memorandum is also intended to emphasize the categorical eligibility of the Head Start and Early Head Start participants and to reiterate the legislative intent to serve these populations nutritious meals through the Child Nutrition Programs without undue barriers.

For questions regarding this memo, please contact ADE at 602-542-8700 and/or contact your ADE Programs Specialist.

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Questions and Answers

1. Do children participating in Head Start or Early Head Start need to complete additional income eligibility forms to qualify for free meals?

Children enrolled in Federal and State-funded Head Start or Early Head Start Programs are categorically eligible to receive free meal benefits without further application or eligibility determination. Categorical eligibility means additional free and reduced price applications and income eligibility forms are not required.

Eligibility determinations for the Child Nutrition Programs are made on an annual basis. As long as the child is enrolled in Head Start or Early Head Start at the time the annual eligibility determination is made, all reimbursable meals served to that child may be claimed at the free rate.

Institutions, sponsors, and school food authorities (SFA) may establish eligibility of all Head Start enrollees through documentation provided by the Head Start program. Forms of acceptable documentation include:

- an approved Head Start application,
- a statement of Head Start enrollment, or
- a list of participants from a Head Start official.

2. If a child who is eligible for Head Start benefits also attends a child care center or family day care home, is the child automatically eligible for free CACFP meals at the child care facility without further application or eligibility determination?

Yes. All CACFP reimbursable meals served to children enrolled in Head Start or Early Head Start may be claimed at the free rate by child care centers or tier I rates in day care homes in which they are enrolled.

3. Are the siblings or other children who are members of a Head Start child's household also automatically eligible for free meals without further application?

Only children enrolled in Head Start are categorically eligible. Categorical eligibility based on Head Start enrollment **does not** extend to all children in the same household. See CN# 11-09 *Extending Categorical Eligibility to Additional Children in a Household*, September 10, 2009, <http://www.azed.gov/wp-content/uploads/PDF/CN011-09.pdf> for more information.



4. Can a day care home document eligibility for tier I reimbursement based on the provider's own child's enrollment in a Head Start program?

Public Law 110-134 extended categorical eligibility only to children enrolled in Head Start. Therefore, a child's Head Start enrollment does not extend to the provider. This supersedes the guidance found in *Questions and Answers #4: Two-tier Reimbursement Structure for Family Day Care Homes Participating in the Child and Adult Care Food Program (CACFP) Tiering Q & A's* May 16, 1997, <http://www.fns.usda.gov/cnd/Care/Regs-Policy/policymemo/1999-1996/1997-5-16.pdf>.

5. Are children who are enrolled in Head Start but who are members of households that are above the Head Start income eligibility requirements still eligible for CACFP meals at the free rate?

Yes. All reimbursable meals served to children enrolled in Head Start may be claimed at the free rate. Head Start serves primarily children from families with household incomes at or below the Federal poverty level. However, a small proportion of children in families with household incomes above the poverty level may also be served.

The Improving Head Start for School Readiness Act of 2007 (Public Law 110-134) amended sections 9(b)(12)(A)(iii) and 17(c)(5) of the Richard B. Russell National School Lunch Act to make any child enrolled in Head Start categorically eligible for free meals without further application or eligibility determination.

6. Are children enrolled in State funded or Indian Tribal Organization (ITO)-funded pre-kindergarten programs eligible for free meals?

Participation in a State-funded or ITO-funded pre-kindergarten program may be a basis for extending automatic eligibility for free meals if the State agency or ITO ensures that:

- The State-funded or ITO-funded pre-kindergarten program uses income eligibility criteria which are identical to, or more stringent than, the Head Start Program;
- If the State or ITO-funded program is modeled on the Head Start Program and can serve some percentage of children from households with income over Head Start's income guidelines, it can differentiate between children receiving State or ITO funding based on income and children receiving funding based on other criteria;
- If pre-kindergarten funding is provided under more than one State-funded or ITO-funded program and the programs use different income standards, it can differentiate between the children in each program; and
- Income determinations for the State-funded or ITO-funded program do not exceed 12 months in length.

Once the ADE or ITO certifies that all of these conditions have been met, FNS Regional Offices are authorized to approve categorical eligibility to children participating in that State-funded or



ITO-funded pre-kindergarten program for up to one year. The approval may be renewed every year once the FNS Regional Office receives the ADE's or ITO's certification that its State-funded or ITO-funded program still meets these four criteria.

7. Are Early Head Start participants who are pregnant considered categorically eligible for free meals?

Yes. Pregnant participants in Early Head Start and who are otherwise eligible to receive meals through a Child Nutrition Program are categorically eligible for free meals. The Improving Head Start for School Readiness Act of 2007 (Public Law 110-134) amended sections 9(b)(12)(A)(iii) and 17(c)(5) of the Richard B. Russell National School Lunch Act to establish such eligibility.

8. Do Head Start centers need to annually verify enrollment, or is the documentation valid for the entire period a child is enrolled in Head Start or Early Head Start?

Documentation of enrollment is required annually for each CACFP participant, including those enrolled in Head Start and Early Head Start.

9. Do Head Start centers need to document a parent's decision to decline an offered formula?

Because Head Start has more comprehensive infant formula requirements than CACFP, Head Start centers do not need to document a parent's decision to decline offered formula. However, in order for the infant meal to be reimbursable, it must meet the CACFP meal pattern requirements.

10. What role does the Community Development Institute (CDI) play in Head Start and CACFP?

CDI is the National Interim Management contractor for the U.S. Department of Health and Human Services Office of Head Start (OHS). OHS has contracted with CDI, a nonprofit corporation headquartered in Denver, Colorado, to provide interim Head Start management services nationwide. See CACFP 14-2007, *National Interim Head Start Grantee Participation in the Child and Adult Care Food Program: Community Development Institute, August 15, 2007*, http://www.fns.usda.gov/cnd/Care/Regs-Policy/policymemo/2007-2009/CACFP_14-2007.pdf for more information.

